



January 25, 2012

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Lifeline and Link Up Reform and Modernization (WC Docket No. 11-42);
Federal-State Joint Board on Universal Service (CC Docket No. 96-45); and
Lifeline and Link Up (WC Docket No. 03-109)

Dear Ms. Dortch:

On Monday, January 23, 2012, Walter McCormick (USTelecom) and I met with Commissioner Clyburn and her legal advisor, Angela Kronenberg. We discussed reforms to the Lifeline fund to streamline and modernize the program and its administration. In particular, we discussed the advantages of a national database that would “verify consumer eligibility, track verification, and check for duplicates to ensure greater program accountability.”¹ States or a third-party administrator, not lifeline service providers, should be responsible for determining program eligibility. We urged that the Commission move as quickly as possible to implement a national eligibility database, and not to impose burdensome interim certification rules on providers while the database is being developed. We also discussed the importance of broadband pilot projects in understanding barriers to adoption in low income communities. Pilot projects can provide key data and learnings as long as the projects are carefully constructed and aim to provide statistically meaningful data on adoption by relevant communities under different program scenarios.

Pursuant to Commission rules, please include a copy of this notice in each of the above-identified proceedings.

Sincerely,

Jonathan Banks

¹ Lifeline and Link Up Reform and Modernization; Federal-State Joint Board on Universal Service; Lifeline and Link Up, Notice of Proposed Rulemaking, 26 FCC Rcd 2770, ¶ 207 (2011).